

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

OAKFABCO, INC.,

Debtor.

Chapter 11

Case No. 15-27062

Hon. Jack B. Schmetterer

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Monday, September 21, 2015 at 10:30 a.m. or as soon thereafter as counsel may be heard, we shall appear before the Honorable Jack B. Schmetterer in Courtroom 682 at the United States Bankruptcy Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, Illinois, or before any other judge who may be sitting in his place and stead, and present the Debtor's Motion for an Order: (i) Approving the Assumption of a Settlement Agreement and Release Between Oakfabco, Inc. and New England Reinsurance Company; (ii) Approving the Sale of Certain Insurance Policies to New England Reinsurance Company; and (iii) Issuing an Injunction In Favor of New England Reinsurance Company and Certain Others Pursuant to the Sale of Certain Insurance Policies [Docket No. 67] for a preliminary hearing, at which time a final hearing will be set, upon notice and an opportunity to object. You may appear at the hearing if you so desire.

Dated: September 15, 2015
Chicago, Illinois

Respectfully submitted,

REED SMITH LLP

By: /s/ Stephen T. Bobo

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*Proposed Counsel to Debtor and Debtor In
Possession*

CERTIFICATE OF SERVICE

I, Stephen T. Bobo certify that, on September 15, 2015, I filed a copy of the foregoing **Notice of Motion** (relating to the Debtor's Motion for an Order: (i) Approving the Assumption of a Settlement Agreement and Release Between Oakfabco, Inc. and New England Reinsurance Company; (ii) Approving the Sale of Certain Insurance Policies to New England Reinsurance Company; and (iii) Issuing an Injunction In Favor of New England Reinsurance Company and Certain Others Pursuant to the Sale of Certain Insurance Policies [Docket No. 67] (the "**Motion**") using this Court's CM/ECF system, and served all parties consenting to receive electronic service by operation of the CM/ECF. Further, on September 15, 2015, I caused a copy of the Notice of Motion and Motion to be served through Logan & Company, the appointed Notice and Servicing agent to the Debtor, upon the parties identified below, via First Class Mail.

/s/ Stephen T. Bobo

Stephen T. Bobo

SERVICE LIST

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CASE NO: 15-27062 (JBS)

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